

DOCKET NO.: HHD-CV-18-6088970-S : SUPERIOR COURT  
GLORIA FARBER, as Executor of the : J.D. OF HARTFORD  
Estate of HILLIARD FARBER  
V. : AT HARTFORD  
FORE GROUP, INC. and FOTIS DULOS : AUGUST 8, 2019

**REPLY TO SUPPLEMENTAL OBJECTION TO MOTION FOR DEFAULT**

The undersigned is unaware if the Rules provide for a supplemental objection to the motion for default, but in any event it is accurate that Judge Shapiro denied the motion for default but ordered the deposition to go forward within 45 days, and because the plaintiff was anxious to proceed with the deposition, the uncertainty as to what the court would do in the instant case led the plaintiff to re-notice the deposition in the event the default is denied. What defense counsel fails to state is that there were two occasions when the defendants failed to appear for the deposition in the instant case, and one such instance in the case that was before Judge Shapiro. The idea that “in the interest of efficiency and economy, the defendants request that the plaintiff withdraw the pending motion . . . .” is without merit, especially when defense counsel had thumbed their noses at two previous notices of

deposition, as set forth in previous motions for defaults. Moreover, there is the issue reimbursement for attorney's fee even if the default is denied.

PLAINTIFF

By\_\_\_\_\_/s/\_\_\_\_\_  
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**CERTIFICATION**

This is to certify that on the 8th day of August, 2019, a copy of the foregoing was served upon:

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\_\_\_\_\_/s/\_\_\_\_\_  
Richard P. Weinstein